

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
SHIPCO TRANSPORT INC.

Plaintiff,

-against-

JDB INTERNATIONAL, INC.

and

LAPTON FREIGHT INTERNATIONAL, Inc.

Defendants.
-----X

Case No.: 09 CIV 7532(CM)
ECF CASE

AFFIDAVIT OF KLAUS M. THORUP
RE SHIPCO TRANSPORT INC.
RECORDS

I, Klaus M. Thorup, being first duly sworn, say and depose as follows:

I am a Vice President of Shipco Transport Inc.(Shipco), plaintiff in this action, with offices at 80 Washington Street, Hoboken, New Jersey 07030.

As Vice President of Shipco, I am responsible for the custody of the documents and records of the company pertaining to container shipments. I am familiar with the invoices, bills of lading, and the statement of account to defendant JDB International, Inc. (JDB), submitted by Shipco to the court in this matter and related to shipments described in the First Amended Complaint herein pertaining to shipments made by Shipco as NVOCC pursuant to bills of lading provided to the shipper, JDB.

I was Vice President of Shipco at all times when these documents were created. I hereby state that these documents attached to the First Amended Complaint as Exhibits B

(statement of account) and C (invoices from carriers), and attached as exhibits to Plaintiff's Motion to Enter Default Judgment are true and accurate copies of documents in the records of Shipco Transport Inc.

These documents, as well as; bills of lading, Exhibit 3; and Shipco invoices, Exhibit 4, are true copies of records created in the ordinary course of business by Shipco Transport Inc.

I further hereby verify that the Terms and Conditions relating to Shipco bills of lading, a copies of which are attached to the First Amended Complaint and Plaintiff's Motion to Enter Default Judgment as Exhibit "A," are true and accurate copies of documents contained in the records of Shipco and are records created and maintained in the ordinary course of business by Shipco Transport Inc.

Executed under oath at Hoboken, New Jersey on September 15, 2011.

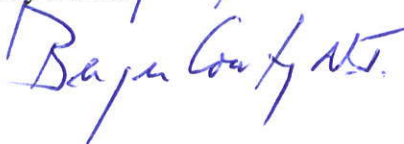


Klaus M. Thorup
Vice President
Shipco Transport Inc.

Sworn to before me this 15

Day of September 2011


Notary Public


Bergen County, N.J.

